

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF VIRGINIA  
LYNCHBURG DIVISION**

<b>IN RE:</b>	)	
	)	<b>CASE NO. 20-60300</b>
<b>ANDREW PAUL CHAMBERLAND,</b>	)	<b>CHAPTER 11</b>
	)	
<b>Debtor.</b>	)	

**NOTICE OF HEARING**

**PLEASE TAKE NOTICE** that a hearing on this Motion will be held on April 2, 2020 at 9:30 a.m. before the Hon. Rebecca B. Connelly at the United States Bankruptcy Court for the Western District of Virginia, 1101 Court Street, Room 210, Lynchburg, Virginia 24504.

**MOTION TO EXTEND TIME WITHIN WHICH PARITES MAY OBJECT TO THE  
APPLICATION TO EMPLOY COUNSEL TO THE DEBTOR**

John P. Fitzgerald, Acting United States Trustee for Region Four, by counsel, moves the Court to extend until March 13, 2020, the time within which an objection may be filed to the application to employ counsel in this case. In support of this motion, the United States Trustee respectfully states as follows:

1. The Debtor filed a voluntary petition for relief under chapter 11, subchapter V of the bankruptcy code on February 21, 2020.
2. The application to employ counsel was filed on February 21, 2020. The deadline to object to the application under Local Rule 2014-1 is March 6, 2020.
3. The creditors' meeting has not been conducted. The creditors' meeting is scheduled for March 23, 2020 in Lynchburg, Virginia.
4. Rule 6003 of the Federal Rules of Bankruptcy Procedure states, in part, "Except to the extent that relief is necessary to avoid immediate and irreparable harm, the court shall not,

within 21 days after the filing of the petition, issue an order granting. . . an application under Rule 2014. . . .”

4. March 13, 2020 complies with Rule 6003 in that it is more than 21 days from the date of the filing of the petition.

WHEREFORE, the United States Trustee, by counsel, moves the Court to extend until March 13, 2020 the time within which an objection may be filed to the application to employ counsel in this case.

Date: 25 February 2020

Respectfully submitted,  
John P. Fitzgerald

By: /s/ Margaret K. Garber  
Assistant United States Trustee

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**CERTIFICATE OF SERVICE**

I certify that on February 25, 2020, I electronically filed the foregoing with the United States Bankruptcy Court for the Western District of Virginia which caused electronic notifications of filing to be served on all registered users of the CM/ECF system that have appeared in this case, including counsel for the Debtors.

/s/ Margaret K. Garber